

<i>SERFF Tracking Number:</i>	<i>PRTA-126041137</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Protective Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>41611</i>
<i>Company Tracking Number:</i>	<i>PAT P-9379 -80</i>		
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>P-9379 -80</i>		
<i>Project Name/Number:</i>	<i>P-9379 -80/P-9379 -80</i>		

Filing at a Glance

Company: Protective Life Insurance Company

Product Name: P-9379 -80

TOI: A02.1G Group Annuities - Deferred Non-Variable and Variable

Sub-TOI: A02.1G.002 Flexible Premium

Filing Type: Form

SERFF Tr Num: PRTA-126041137 State: Arkansas

SERFF Status: Closed-Approved-Closed
State Tr Num: 41611

Co Tr Num: PAT P-9379 -80

State Status: Approved-Closed

Reviewer(s): Linda Bird

Author: Pat Van Keulen

Disposition Date: 02/24/2009

Date Submitted: 02/19/2009

Disposition Status: Approved-Closed

Implementation Date Requested: 05/01/2009

Implementation Date:

State Filing Description:

General Information

Project Name: P-9379 -80

Project Number: P-9379 -80

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 02/24/2009

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Group

Group Market Size: Small and Large

Group Market Type: Trust

Explanation for Other Group Market Type:

State Status Changed: 02/24/2009

Created By: Pat Van Keulen

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Pat Van Keulen

Filing Description:

P-9379 PENALTY-FREE WITHDRAWAL ENDORSEMENT

P-9380 ENDORSEMENT TO ESTABLISH THE DEFAULT GUARANTEED PERIOD

The listed forms are submitted for filing acknowledgement or prior approval as appropriate. The implementation date is May 1, 2009, or upon approval by your Department if later. The forms will not replace any forms currently in use by the Company. They are being filed countrywide, and do not contain any unusual or possibly controversial items that vary from normal company or industry standards. They are in final laser print, subject only to minor modification in paper size, stock, ink, type face (but not font size), border, company logo and adaptation to computer printing, and subject to

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variable information as bracketed. Our Statement of Variability is provided.

The submitted forms are endorsements currently intended for use with Group Flexible Premium Deferred Limited Market Value Adjusted Annuity Contract form IPD-2152 approved 10/25/2006.

Form P-9379 provides for the withdrawal of certain interest without the imposition of withdrawal charges. Form P-9380 provides for default to a one year renewal guaranteed period when an existing guaranteed period expires. Currently, the default is to a new period of the same or closest duration as the period expiring. The one year renewal period will have no market value adjustment or withdrawal charges.

There is no premium charge for either endorsement. These endorsements do not make any changes that would affect valuation or nonforfeiture values.

Thank you for your attention to this filing. If there are any questions, I can be reached in SERFF, or at pat.vankeulen @ protective.com, or toll-free at 1-866-874-4001 x7856.

Company and Contact

Filing Contact Information

Pat Van Keulen, Filing Analyst	Pat.VanKeulen@protective.com
1707 North Randall Road, Suite 310	847-930-7856 [Phone] 7856 [Ext]
Elgin, IL 60123	847-930-8280 [FAX]

Filing Company Information

Protective Life Insurance Company	CoCode: 68136	State of Domicile: Tennessee
2801 Highway 280	Group Code: 458	Company Type:
Birmingham, AL 35223	Group Name:	State ID Number:
(800) 866-3555 ext. [Phone]	FEIN Number: 63-0169720	

Filing Fees

Fee Required?	Yes
Fee Amount:	\$40.00
Retaliatory?	No
Fee Explanation:	\$20 x 2 Endorsements.
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Protective Life Insurance Company	\$40.00	02/19/2009	25828125

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Filing Company:	Protective Life Insurance Company	State Tracking Number:	41611
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Product Name:	P-9379 -80		
Project Name/Number:	P-9379 -80/P-9379 -80		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	02/24/2009	02/24/2009

<i>SERFF Tracking Number:</i>	<i>PRTA-126041137</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Protective Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>41611</i>
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Disposition

Disposition Date: 02/24/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Statement of Variability		Yes
Form	PENALTY-FREE WITHDRAWAL		Yes
	ENDORSEMENT		
Form	ENDORSEMENT TO ESTABLISH THE DEFAULT GUARANTEED PERIOD		Yes

SERFF Tracking Number: PRTA-126041137 State: Arkansas

Filing Company: Protective Life Insurance Company State Tracking Number: 41611

Company Tracking Number: PAT P-9379 -80

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable

Product Name: P-9379 -80

Project Name/Number: P-9379 -80/P-9379 -80

Form Schedule

Lead Form Number: P-9379

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	P-9379	Policy/Cont PENALTY-FREE ract/Fratern WITHDRAWAL al ENDORSEMENT Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		52.000	P-9379 Endorsement - PenaltyFree.p df
	P-9380	Policy/Cont ENDORSEMENT TO Initial ract/Fratern ESTABLISH THE al DEFAULT Certificate: GUARANTEED Amendmen PERIOD t, Insert Page, Endorseme nt or Rider	Initial		55.000	P-9380 Endorsement - DefaultRenew al.pdf

PENALTY-FREE WITHDRAWAL ENDORSEMENT

We are amending the 'SURRENDERS' section of the Contract to which this endorsement is attached to add provisions creating certain penalty-free withdrawals. All Contract provisions not expressly modified by this endorsement remain in full force and effect.

1. The two provisions below are inserted immediately following the provision entitled 'Partial Surrenders':

Penalty-Free Amount - After a Sub-Account's first Anniversary, you may withdraw all or a portion of the interest credited to that Sub-Account during the prior Sub-Account Year. This is the Sub-Account's annual "penalty-free amount". We will not assess the surrender charge or apply the market value adjustment to aggregate surrenders from a Sub-Account during a Sub-Account Year that do not exceed its penalty-free amount.

Interest Withdrawals - Prior to the Annuity Commencement Date, you may instruct us to automatically surrender interest from one or more Sub-Accounts as it accrues on a monthly, quarterly, semi-annual or annual basis. Your Written Notice must specify the Sub-Account(s) from which interest withdrawals are to be taken, the withdrawal frequency, and all information necessary to complete the payments to you. We will not assess the surrender charge or apply the market value adjustment to interest withdrawals.

2. The second sentence in the provision entitled 'Calculating the Surrender Charge' is deleted and replaced with the sentence below:

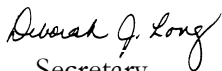
We calculate the surrender charge by multiplying the applicable surrender charge percentage by the amount surrendered from the Sub-Account in excess of any available penalty-free amount.

3. The second sentence in the provision entitled 'Calculating the Market Value Adjustment' is deleted and replaced with the sentence below:

We calculate the market value adjustment by multiplying the amount surrendered from the Sub-Account in excess of any available penalty-free amount by the MVA % derived from the market value adjustment formula on the Schedule.

Signed for the Company and made a part of the Contract as of the Contract Date.

PROTECTIVE LIFE INSURANCE COMPANY


Secretary

ENDORSEMENT TO ESTABLISH THE DEFAULT GUARANTEED PERIOD

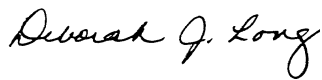
The Contract to which this Endorsement is attached is amended to change the default allocation if the Owner does not instruct us how to allocate the maturing Sub-Account Value at the end of its Guaranteed Period.

The last two paragraphs of the section entitled “**Sub-Account Maturity**” are deleted and replaced with the new paragraph below.

“In addition to the other Guaranteed Periods that may be available, we will always offer a 1-year renewal Guaranteed Period for allocations of Maturity Value. No surrender charge or market value adjustment will apply to surrenders from Sub-Accounts associated with a 1-year renewal Guaranteed Period. Unless you instruct us otherwise in writing prior to the end of an existing Sub-Account’s Guaranteed Period, your Maturity Value will be automatically transferred to a new Sub-Account with a 1-year renewal Guaranteed Period.”

Signed for the Company and made a part of the Contract as of its Effective Date.

PROTECTIVE LIFE INSURANCE COMPANY

A handwritten signature in cursive script, reading "Deborah J. Long".

Secretary

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Variable and Variable
Product Name: P-9379 -80
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Supporting Document Schedules

Item Status: Status
Date:

Satisfied - Item: Flesch Certification

Comments:

Attachment is our readability certification.

Attachment:

FLESCH P-9379 -80.pdf

Item Status: Status
Date:

Bypassed - Item: Application

Bypass Reason: Filing is not of a policy.

Comments:

Item Status: Status
Date:

Satisfied - Item: Statement of Variability

Comments:

Attachment is our statement of variability for the submitted forms.

Attachment:

StmntVariables P-9379 -80.pdf

Protective Life Insurance Company

NAIC 458-68136

FEIN 63-0169720

READABILITY CERTIFICATION

Form Number	Form Title	Flesch Score
P-9379	PENALTY-FREE WITHDRAWAL ENDORSEMENT	52
P-9380	ENDORSEMENT TO ESTABLISH THE DEFAULT GUARANTEED PERIOD	55

This is to certify that the forms listed in the above table (and the corresponding state variations) have achieved the required Flesch Reading Ease Test scores and comply with all applicable requirements.

Marc E. Cavadel, J.D., FLMI, AIRC, AAPA
AVP – Product Development
Protective Life Insurance Company

February 18, 2009

Date

STATEMENT OF VARIABLE INFORMATION FOR

Penalty-Free Withdrawal Endorsement – Form # P-9379

Endorsement to Establish the Default Guaranteed Period – Form # P-9380

February 16, 2009

GENERAL VARIABLES

1. Company address, phone numbers, locations of administrative offices and/or services; website and email addresses; and the names and signatures of company officers.
2. The appearance of the forms may vary in a non-material fashion depending upon factors including, but not limited to: changes in print vendor, software or hardware configurations; typeface, style and font attributes, but not font size; paper stock and weight; and, the presence or absence of color.

General and specific variables will not change with respect to in-force contracts without notification, appropriate regulatory approvals, and (where required) consent of the contract owner.

Variables are indicated by placement within square brackets []

SPECIFIC VARIABLES

No variables other than as indicated in General Variables.

CERTIFICATION

I certify that the variable data fields contained within the submitted forms will not be populated with any data other than that which is included in the parameters contained in this Statement of Variability.

Signed on behalf of the company by:

Marc E. Cavadel, J.D., FLMI, AIRC, AAPA
AVP – Product Development
Protective Life Insurance Company